

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS  
ENTERPRISES, LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC., BAD  
BOY PRODUCTIONS HOLDINGS, INC., BAD  
BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT  
LLC, BAD BOY PRODUCTIONS LLC,  
ORGANIZATIONAL DOES 1-10, INDIVIDUAL  
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**NOTICE OF DEFENDANT SHAWN CARTER’S MOTION FOR SANCTIONS AND TO  
STRIKE THE COMPLAINT PURSUANT TO FED. R. CIV. P. 11**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, declaration of Alex Spiro and accompanying exhibits, and any other arguments or materials that the Court may consider before this motion is taken under submission by the Court, Defendant Shawn Carter will move this Court before the Hon. Analisa Torres, 500 Pearl St., New York, NY 10007, at a date and time to be determined by this Court, for an order, (i) dismissing Plaintiff’s Amended Complaint pursuant to Rule 11(c) of the Federal Rules of Civil Procedure, (ii) imposing monetary sanctions on Anthony Buzbee and the Buzbee Law Firm; (iii) directing the parties to confer regarding a briefing schedule for the determination of Mr. Carter’s reasonable attorney’s fees and cost, and (iv) such other and further relief the Court deems just and equitable.

Respectfully submitted,

DATED: January 8, 2025

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Alex Spiro

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